

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

MALIBU MEDIA, LLC,)	
)	
Plaintiff,)	Civil Case No. 3:19-cv-00802-M
)	
v.)	
)	
JOHN DOE infringer using)	
IP address 162.231.213.159,)	
)	
Defendant.)	
_____)	

**PLAINTIFF’S MOTION FOR LEAVE TO PROCEED WITHOUT LOCAL
COUNSEL**

In accordance with N.D. Tex. L. R. 83.10(a) and for the reasons explained below, Plaintiff Malibu Media, LLC (referred to as "Plaintiff" or "Malibu Media") requests leave of Court to proceed without local counsel.

By way of background, Malibu Media alleges that John Doe, a copyright infringer using IP address 162.231.213.159 (referred to as "Defendant"), infringed on Plaintiff’s original creative copyrighted works by downloading and/or distributing such works through BitTorrent protocol.

The undersigned is a member of the bar of this Court, but maintains a principal office in Houston, Texas. The undersigned has handled and is currently handling numerous copyright infringement cases for Plaintiff in District Courts across the state of Texas, including this district. Because of that the undersigned frequently travels to various

locations in this district and the other districts in Texas. The undersigned commits to being available at the Court's request for appearances.

For these reasons, Malibu Media requests leave of Court to proceed without local counsel.

Dated: July 17, 2019

Respectfully submitted,

By: /s/ Paul S. Beik
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CERTIFICATE OF CONFERENCE AND SERVICE

I hereby certify that I was unable to confer with, or to serve a defendant because he or she has not yet been named and served with an amended complaint in this matter, and has not entered an appearance personally nor through counsel in this matter.

By: /s/ Paul S. Beik